

Yongmoon Kim
Philip D. Stern
KIM LAW FIRM LLC
411 Hackensack Avenue, Suite 701
Hackensack, New Jersey 07601
Tel. & Fax: (201) 273-7117

Attorneys for Plaintiffs Elaine Levins and William Levins

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ELAINE LEVINS AND WILLIAM
LEVINS, *on behalf of themselves and
those similarly situated,*

Plaintiff,

vs.

HEALTHCARE REVENUE
RECOVERY GROUP, d/b/a ARS
ACCOUNT RESOLUTION SERVICES;
and JOHN and JANE DOES 1 to 25,

Defendants.

Case 1:17-cv-00928-CPO-MJS

**NOTICE OF MOTION FOR
CLASS CERTIFICATION**

**[ORAL ARGUMENT
REQUESTED]**

PLEASE TAKE NOTICE that on July 5, 2022, at 10:00 a.m. or at such other time as counsel may be heard before the Honorable Christine P. O’Hearn, United States District Judge for the District of New Jersey, in Courtroom 5A of the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey, the undersigned counsel for Plaintiffs Elaine Levins and

William Levins will move for an Order certifying this case to proceed as a class action pursuant to FED. R. CIV. P. 23.

PLEASE TAKE FURTHER NOTICE, the grounds supporting class certification are further explained and supported by the accompanying (i) Brief, (ii) the Declarations of Elaine Levins, William Levins, Yongmoon Kim, Esq., and Philip D. Stern, Esq., (iii) the exhibits, documents, and pleadings on file with the Court, and (iv) any oral argument the Court may allow by Plaintiffs' counsel regarding this motion.

Respectfully submitted,

KIM LAW FIRM LLC

s/Philip D. Stern
Philip D. Stern

Dated: June 6, 2022